

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
	)	
ULTRA PETROLEUM CORP., <i>et al.</i> , <sup>1</sup>	)	Case No. 20-32631 (MI)
	)	
Debtors.	)	(Jointly Administered)
	)	

**AGREED NOTICE OF WITHDRAWAL OF CERTAIN PENDING MOTIONS  
PURSUANT TO SETTLEMENT**

**PLEASE TAKE NOTICE** that, pursuant to a settlement reached between the Debtors, the Ad Hoc Group of Term Lenders, and the Official Committee of Unsecured Creditors (the “Committee”), the following motions are **WITHDRAWN**:

- the Expedited Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors’ Estates and (II) Exclusive Settlement Authority [Docket No. 337];
- the Second Expedited Motion of the Official Committee of Unsecured Creditors for (I) Leave, Standing, and Authority to Commence and Prosecute Certain Claims and Causes of Action on Behalf of the Debtors’ Estates and (II) Exclusive Settlement Authority [Docket No. 534]; and
- the Debtors’ Emergency Motion to Exclude the Proposed Expert Testimony of Manish Kumar and the Committee’s Unprecedented Theory on “Reasonably Equivalent Value” [Docket No. 586].

The Committee will also be withdrawing its objection to confirmation and will be supporting the proposed Plan of Reorganization, as amended to incorporate settlement terms to be announced on the record at the confirmation hearing on August 10, 2020, at 9:00 AM.

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<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of each Debtor’s federal tax identification number (if any) are the following: Ultra Petroleum Corp. (3838); Keystone Gas Gathering, LLC (N/A); Ultra Resources, Inc. (0643); Ultra Wyoming, LLC (6117); Ultra Wyoming LGS, LLC (0378); UP Energy Corporation (4296); UPL Pinedale, LLC (7214); and UPL Three Rivers Holdings, LLC (7158). The Debtors’ service address is 116 Inverness Drive East, Suite 400, Englewood, Colorado 80112.

Dated: August 9, 2020  
Houston, Texas

/s/ Matthew D. Cavanaugh

Matthew D. Cavanaugh (TX Bar No. 24062656)

Jennifer F. Wertz (TX Bar No. 24072822)

Kristhy M. Peguero (TX Bar No. 24102776)

**JACKSON WALKER LLP**

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

-and-

David R. Seligman, P.C. (admitted *pro hac vice*)

Brad Weiland (admitted *pro hac vice*)

Michael B. Slade (admitted *pro hac vice*)

Luke Ruse (admitted *pro hac vice*)

Sydney Schneider (admitted *pro hac vice*)

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

300 North LaSalle Street

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

AnnElyse Scarlett Gains (admitted *pro hac vice*)

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

1301 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

Telephone: (202) 389-5046

Facsimile: (202) 389-5200

*Co-Counsel for the Debtors and Debtors in Possession*

By: /s/ Kenneth Pasquale

Charles A. Beckham, Jr.

Texas State Bar No. 02016600

Kelli S. Norfleet

Texas State Bar No. 24070678

Arsalan Muhammad

Texas State Bar No. 24074771

Haynes and Boone LLP

1221 McKinney Street, Suite 2100

Houston, Texas 77010

Telephone.: (713) 547-2000  
Facsimile: (713) 547-2600  
Email: charles.beckham@haynesboone.com  
Email: kelli.norfleet@haynesboone.com  
Email: arsalan.muhammad@haynesboone.com

-and-

**STROOCK & STROOCK & LAVAN LLP**

Jayme T. Goldstein (admitted *pro hac vice*)  
Kenneth Pasquale (admitted *pro hac vice*)  
Christopher M. Guhin (admitted *pro hac vice*)  
Emily L. Kuznick (admitted *pro hac vice*)  
180 Maiden Lane  
New York, NY 10038  
Telephone: 212-806-5400  
Facsimile: 212-806-6006  
Email: jgoldstein@stroock.com  
Email: kpasquale@stroock.com  
Email: cguhin@stroock.com  
Email: ekuznick@stroock.com

*Counsel For The Ad Hoc Group*

/s/ Jeffrey Jonas

**MCKOOL SMITH**

John J. Sparacino  
Joshua J. Newcomber  
Paul Williams  
Kaitlyn Dawson  
600 Travis Street  
Suite 7000  
Houston, TX 77002  
Telephone: (713) 485-7300  
Facsimile: (713) 485-7344  
Emails: jnewcomer@mckoolsmith.com  
jsparacino@mckoolsmith.com  
pwilliams@mckoolsmith.com  
kdawson@mckoolsmith.com

-and-

**BROWN RUDNICK LLP**

Robert J. Stark\*  
Bennett S. Silverberg\*  
Uchechi Egeonuigwe\*  
Seven Times Square  
New York, NY 10036  
Telephone: (212) 209-4800  
Facsimile: (212) 209-4801  
Emails: rstark@brownrudnick.com  
bsilverberg@brownrudnick.com  
uegeonuigwe@brownrudnick.com

-and-

Jeffrey L. Jonas\*  
James Stoll\*  
Stephanie Calnan\*  
One Financial Center  
Boston, MA 02111  
Telephone: 617-856-8200  
Email: jjonas@brownrudnick.com  
jstoll@brownrudnick.com  
scalnan@brownrudnick.com  
\*admitted *pro hac vice*

*Co-Counsel to the Official Committee of Unsecured Creditors*

**Certificate of Service**

I certify that on August 9, 2020, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Matthew D. Cavanaugh

Matthew D. Cavanaugh